1 2 3 Honorable August B. Landis United States Bankruptcy Judge 4 Entered on Docket September 30, 2022 6 Bart K. Larsen, Esq. 7 Nevada Bar No. 8538 Kyle M. Wyant, Esq. 8 Nevada Bar No. 14652 **SHEA LARSEN** 9 1731 Village Center Circle, Suite 150 Las Vegas, Nevada 89134 Telephone: (702) 471-7432 10 Fax: (702) 926-9683 11 Email: blarsen@shea.law kwyant@shea.law 1731 Village Center Circle, Suite 150 12 Las Vegas, Nevada 89134 Attorneys for HASelect-Medical Receivables SHEA LARSEN 13 Litigation Finance Fund International SP 702) 471-7432 14 UNITED STATES BANKRUPTCY COURT 15 **DISTRICT OF NEVADA** 16 In re: Case No. 21-14486-abl 17 INFINITY CAPITAL MANAGEMENT, INC. Chapter 7 18 Debtor. 19 HASELECT-MEDICAL RECEIVABLES 20 LITIGATION FINANCE FUND Adversary Case No. 21-01167-abl INTERNATIONAL SP, 21 **ORDER GRANTING STIPULATION** Plaintiff, TO EXTEND DEADLINE TO 22 **OPPOSE TECUMSEH-INFINITY** MEDICAL RECEIVABLES FUND, 23 LP'S MOTION FOR PARTIAL SUMMARY JUDGMENT AS TO TECUMSEH-INFINITY MEDICAL 24 RECEIVABLES FUND, LP, **DIRECT PURCHASE RECEIVABLES** [ECF NO. 90] 25 Defendant. 26 27 28

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1	TECUMSEH-INFINITY MEDICAL		
2	RECEIVABLES FUND, LP,		
3	Counter-Claimant,		
4	v.		
5	HASELECT-MEDICAL RECEIVABLES LITIGATION FINANCE FUND		
6	INTERNATIONAL SP,		
7	Counter-Defendant.		
8	HASELECT-MEDICAL RECEIVABLES LITIGATION FINANCE FUND		
9	INTERNATIONAL SP,		
10	Counter-Claimant,		
11	V.		
12	TECUMSEH–INFINITY MEDICAL RECEIVABLES FUND, LP,		
13	Counter-Defendant.		
14	The Court having considered the Stipulatio		

The Court having considered the Stipulation to Extend Deadline to Oppose Tecumseh-Infinity Medical Receivables Fund, LP's Motion for Partial Summary Judgment as to Direct Purchase Receivables [ECF No 119] (the "Stipulation") by and between Plaintiff HASelect-Medical Receivables Litigation Finance Fund International SP ("HASelect") and Defendant Tecumseh-Infinity Medical Receivables Fund, LP ("<u>Tecumseh</u>"), and good cause appearing therefor,

IT IS HEREBY ORDERED that the Stipulation attached hereto as **Exhibit 1** is approved; IT IS SO ORDERED.

Prepared and submitted by:

SHEA LARSEN

/s/ Bart K. Larsen, Esq.

Bart K. Larsen, Esq.

24 Nevada Bar No. 8538

Kyle M. Wyant, Esq. 25

Nevada Bar No. 14652

1731 Village Center Circle, Suite 150

Las Vegas, Nevada 89134

27 Attorneys for HASelect-Medical Receivables

Litigation Finance Fund International SP 28

EXHIBIT 1

2 3 4 5 6	1	Bart K. Larsen, Esq. Nevada Bar No. 8538		
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	8	UNITED STATES BANK	KRUPTCY COURT	
SHEA LARSEN 1731 Village Center Circle, Suite 150 Las Vegas, Nevada 89134 (702) 471-7432	9	DISTRICT OF NEVADA		
	10	In re:	G N 21 14407 11	
	11	INFINITY CAPITAL MANAGEMENT, INC.	Case No. 21-14486-abl Chapter 7	
	12	Debtor.		
	13			
	14	HASELECT-MEDICAL RECEIVABLES LITIGATION FINANCE FUND	Adversary Case No. 21-01167-abl	
SHEA Tillage Cen as Vegas,		INTERNATIONAL SP,	STIPULATION TO EXTEND	
SJ 31 Vill Las	16	Plaintiff,	DEADLINE TO OPPOSE TECUMSEH-INFINITY MEDICAL	
17	17	V.	RECEIVABLES FUND, LP'S MOTION FOR PARTIAL SUMMARY	
21 22 23 24 25 26 27		TECUMSEH–INFINITY MEDICAL RECEIVABLES FUND, LP,	JUDGMENT AS TO DIRECT PURCHASE RECEIVABLES [ECF	
		Defendant.	NO. 90]	
	20			
	21	TECUMSEH–INFINITY MEDICAL RECEIVABLES FUND, LP,		
	22	Counter-Claimant,	Hearing Date: October 25, 2022	
	23	v.	Hearing Time: 1:30 p.m.	
	24	HASELECT-MEDICAL RECEIVABLES		
	25	LITIGATION FINANCE FUND INTERNATIONAL SP,		
	26	Counter-Defendant.		
	27	Counter Defendant.		
	28		1	

HASELECT-MEDICAL RECEIVABLES
LITIGATION FINANCE FUND
INTERNATIONAL SP,

Counter-Claimant,

v.

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TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP,

Counter-Defendant.

HASelect-Medical Receivables Litigation Finance Fund International SP ("HASelect"), by and through its undersigned counsel, and Tecumseh-Infinity Medical Receivables Fund, LP ("Tecumseh"), by and through its undersigned counsel (each a "Party" and, collectively, the "Parties"), hereby agree and stipulate as follows:

- 1. On or about August 26, 2022, Tecumseh filed its Motion for Partial Summary *Judgment as to Direct Purchase Receivables* [ECF No. 90] (the "Motion");
 - 2. The Motion was set for hearing for October 25, 2022 at 1:30 p.m.;
- 3. Pursuant to Local Rule 7056, unless the Court orders otherwise, HASelect is to file its Opposition to the Motion within twenty-one (21) days after service of the Motion, making HASelect's Opposition to the Motion due on September 16, 2022 (the "Opposition Deadline");
- 4. Pursuant to Local Rule 7056, unless the Court orders otherwise, Tecumseh is to file its reply to the Opposition within fourteen (14) days after service of the Opposition (the "Reply Deadline");
- 5. Previously, the Parties agreed to extend the Opposition Deadline from September 16, 2022 to September 28, 2022 and extend the Reply Deadline to twenty-six (26) days after service of the Opposition which the Court approved via an order entered on September 19, 2022, see [ECF No. 114];
- 6. Based on the reasons set forth in the previous stipulation and the extended amount of time that remains prior to the hearing of the Motion, the Parties have agreed to further extend the Opposition Deadline.

ACCORDINGLY, IT IS HEREBY STIPULATED that the Opposition Deadline shall be extended two (2) days from September 28, 2022 to September 30, 2022.

IT IS FURTHER STIPULATED that the Reply Deadline will be due twenty-four (24) days after service of the Opposition.

IT IS SO STIPULATED.

SHEA LARSEN

/s/ Bart K. Larsen, Esq. BART K. LARSEN, ESQ. Nevada Bar No. 8538 KYLE M. WYANT, ESQ. Nevada Bar No. 14652 1731 Village Center Circle, Suite 150 Las Vegas, Nevada 89134

Attorneys for HASelect-Medical Receivables Litigation Finance Fund International SP

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-and-

GARMAN TURNER GORDON LLP

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Attorneys for Tecumseh–Infinity Medical Receivable Fund, LP

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CERTIFICATE OF SERVICE

- 1. On September 28, 2022, I served the following document(s): SECOND STIPULATION TO EXTEND DEADLINE TO OPPOSE TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP'S MOTION FOR PARTIAL SUMMARY JUDGMENT AS TO DIRECT PURCHASE RECEIVABLES [ECF NO. 90]
- 2. I served the above document(s) by the following means to the persons as listed below:
 - a. ECF System:

CLARISSE L. CRISOSTOMO on behalf of ROBERT E. ATKINSON clarisse@nv-lawfirm.com, bknotices@nv-lawfirm.com

GERALD M GORDON on behalf of TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP ggordon@gtg.legal, bknotices@gtg.legal

MICHAEL D. NAPOLI on behalf of TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP

michael.napoli@akerman.com,

<u>cindy.ferguson@akerman.com;catherine.kretzschmar@akerman.com;laura.taveras@akerman.com;masterdocketlit@akerman.com;teresa.barrera@akerman.com</u>

ARIEL E. STERN on behalf of TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP

ariel.stern@akerman.com, akermanlas@akerman.com

- □ b. United States mail, postage fully prepaid:
- □ c. Personal Service:

I personally delivered the document(s) to the persons at these addresses:

For a party represented by an attorney, delivery was made by
handing the document(s) at the attorney's office with a clerk or other person in
charge, or if no one is in charge by leaving the document(s) in a conspicuous place
in the office.

For a party, delivery was made by handling the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

d. By direct email (as opposed to through the ECF System): Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

 \Box e. By fax transmission:

Based upon the written agreement of the parties to accept service by fax

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1731 Village Center Circle, Suite 150

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Las Vegas, Nevada 89134

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transmission or a court order, I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the record of the fax transmission is attached.

f. By messenger:

I served the document(s) by placing them in an envelope or package addressed to the persons at the addresses listed below and providing them to a messenger for service.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 28, 2022.

By: /s/ Bart K. Larsen, Esq,

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